

THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

NORMAN TROY LYNCH, JR.,	:	
	:	
Plaintiff,	:	
	:	3:18-CV-2044
v.	:	(JUDGE MARIANI)
	:	
AUDREY GRINELL DUCASSE,	:	
	:	
Defendant.	:	

SPECIAL VERDICT QUESTIONS

Question 1:

You must answer "Yes" to Question 1.

Was Defendant, Audrey Grinell Ducasse, negligent?

Yes X No _____

Please proceed to Question 2.

Question 2:

You must answer "Yes" to Question 2.

Was the negligence of the defendant a factual cause of any harm to Plaintiff Norman Troy Lynch, Jr.?

Yes X No _____

Please proceed to Question 3.

Question 3:

Was Plaintiff, Norman Troy Lynch, Jr., negligent?

Yes X No _____

If you answered "Yes" to Question 3, please proceed to Question 4.

If you answered "No" to Question 3, then you have found that Defendant Ducasse's negligence equals 100%. Please proceed to Question 6.

Question 4:

Was Norman Troy Lynch Jr.'s negligence a factual cause of any harm to him?

Yes X No _____

If you answered "Yes" to Question 4, please proceed to Question 5.

If you answered "No" to Question 4, then you have found that Defendant Ducasse's negligence equals 100%. Please proceed to Question 6.

Question 5:

**Only answer Question 5 if you answered "Yes" to Questions 3 and 4.
Otherwise, please proceed to Question 6.**

Taking the combined negligence that was a factual cause of any harm to Plaintiff Lynch as 100 percent, what percentage of that negligence do you attribute to each party?

Percentage of negligence attributable to Defendant Ducasse:

65 %

Percentage of negligence attributable to Plaintiff Lynch:

35 %

Total

100%

If you have found Norman Troy Lynch Jr.'s percentage of negligence is greater than 50 percent, the Plaintiff cannot recover and your deliberations have concluded. The foreperson should sign and date the verdict slip and return it to the Courtroom Deputy.

If you have not found Norman Troy Lynch Jr.'s percentage was greater than 50 percent, then please proceed to Question 6.

Question 6:

State the amount of damages, if any, sustained by Norman Troy Lynch Jr. as a result of this accident, **without regard to and without reduction by any percentage of negligence that you have attributed to Mr. Lynch.**

The fact that a category is listed below does not mean that you must award damages with respect to that category if you find the evidence does not support such a claim.

- (a) Future medical expenses \$ 3,000,000.00
- (b) Past and Future Loss of Earnings
and Earning Capacity \$ 1,500,000.00
- (c) Past, present, and future pain and suffering,
embarrassment and humiliation,
loss of enjoyment of life, and disfigurement \$ 250,000.00
- Total \$ 4,750,000.00

Please proceed to the following page.

Your deliberations have concluded. Please return your answers to these questions on the verdict form signed and dated by the jury foreperson to the Courtroom Deputy.

THE FOREPERSON MUST SIGN AND DATE THIS VERDICT FORM.

Date: June 23, 2023


Foreperson MICHAEL T. DELACH